

# SUPPLIER CODE OF CONDUCT

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MONDRAGON  
ASSEMBLY



## 1. OBJECT

### 对象

Mondragon Assembly considers its suppliers, contractors and external partners to be an indispensable part of achieving its objectives of growth and improvements in quality of service, seeking to establish relationships with them based on trust and mutual benefit.

The Mondragon Assembly Supplier Code of Conduct is seen as an extension of our company's Code of Conduct and aims to establish the minimum guidelines that should govern the behaviour of suppliers, contractors and external partners in accordance with the business culture and regulatory system of Mondragon Assembly.

The criteria set out in this Code are not intended to cover every situation or circumstance that may arise, but rather to establish general guidelines to guide those concerned in terms of their behaviour during the course of their professional activity.

Mondragon Assembly is committed to promoting and encouraging its suppliers, contractors and external collaborating companies to adopt practices in accordance with the guidelines included in this Code, and will provide the necessary resources to ensure that they are aware of and understand this Code and are able to comply with it.

Compliance with this Code is unrelated to where suppliers, contractors and collaborating companies operate around the world, without prejudice to compliance with the legislation that exists in each country.

All suppliers, contractors and collaborating companies are able to approach the Mondragon Assembly Conduct and Compliance Committee confidentially, in good faith and without fear of reprisal, in order to report any breach of the Code of Conduct guidelines that they observe during the course of their professional activities. This communication can be made through the S.R. and Compliance channel available on our website [www.mondragon-assembly.com](http://www.mondragon-assembly.com) and/or via email to: [socialresponsibility@mondragon-assembly.com](mailto:socialresponsibility@mondragon-assembly.com). The communications received will be treated in confidence and in accordance with the provisions of current legislation on data protection.

This Code of Conduct includes the commitments established in the United Nations Global Compact and the Mondragon Assembly Integrated Management System Policy.

蒙德拉贡认为供应商、承包商和外部合作伙伴是其实现成长和提高服务质量不可或缺的一部分，并在互相信任和互利的基础上与他们建立良好的关系。

蒙德拉贡供应商行为准则被视为本公司行为准则的延伸，旨在根据蒙德拉贡的商业文化和监管体系，建立规范供应商、承包商和外部合作伙伴行为的最低准则。本准则规定的标准并非旨在涵盖所有可能出现的情况，而是建立通用准则，以指导有关人员在他们的专业活动过程中的行为。

蒙德拉贡致力于促进和鼓励供应商、承包商和外部合作伙伴根据本准则作业，并会提供必要的资源，以确保他们了解和理解本准则，并能够遵守该准则。



对本准则的遵守与供应商、承包商和合作公司在世界何地运营无关，亦不影响对各国法律的遵守。

所有供应商、承包商和合作伙伴都能够无惧报复，以保密的方式和真诚的态度与蒙德拉贡行为和合规委员会联系，以便报告他们在专业活动过程中发现的任何违反行为准则的行为。您可以通过我们的网站 [www.mondragon-assembly.com](http://www.mondragon-assembly.com) 社会责任和合规栏目和/或通过电子邮件至 [socialresponsibility@mondragon-assembly.com](mailto:socialresponsibility@mondragon-assembly.com) 进行沟通。收到的函件将保密处理，并按照现行数据保护立法的规定处理。

这一行为准则包括联合国全球契约组织和蒙德拉贡综合管理系统政策中所作的承诺。

## 2. SOCIAL RESPONSIBILITY GUIDELINES

### 社会责任准则

- **Human rights:** Mondragon Assembly's suppliers and partners must support and respect the protection of internationally recognised human rights within their sphere of influence and must ensure that they are not complicit in human rights abuses.
- **人权:** 蒙德拉贡的供应商和合作伙伴必须在他们的能力范围内支持和尊重对国际公认的人权的保护，并必须确保它们不参与侵犯人权的行为。
- **Child labour:** The employment of children in violation of ILO (International Labour Organisation) conventions is prohibited. (ILO Convention no. 138).
- **童工:** 禁止违反劳工组织（国际劳工组织）公约雇用儿童。（国际劳工组织公约第138号）。
- **Forced and compulsory labour:** Workers shall be free to end the employment relationship in accordance with the established time limits. The supplier may not resort to forced or compulsory labour in any situation. Work is considered forced and compulsory when it is required of an individual under threat and when the individual does not volunteer. (ILO Conventions no. 29 and 105).
- **强迫劳动和强制劳动:** 劳动者应当按照规定的时限自由结束劳动关系。供应商在任何情况下都不得使用强迫或强制劳动。当个人在受到威胁的情况下工作，且并非自愿时，则工作被认为是强迫和强制性的。（国际劳工组织公约第29号和第105号）。
- **Freedom of association:** Workers shall have the right to associate freely, to join unions, and to appoint representatives. The supplier shall ensure that trade union independence and pluralism are respected. (ILO Conventions no. 87 and 135). The supplier undertakes to promote collective bargaining as a central element of labour relations. (ILO Convention no. 68).



- **结社自由:** 工人有自由结社、参加工会和任命代表的权利。供应商应保证工会的独立性和多元性得到尊重。（国际劳工组织公约第87号和第135号）。  
供应商承诺促进集体谈判，作为劳资关系的核心内容。（国际劳工组织公约第68号）。
- **Remuneration and social benefits:** Mondragon Assembly suppliers, contractors and external partners will remunerate their employees in an appropriate manner, adjusted to their skills, responsibilities and duties, and in line with the applicable legislation and the conditions of the markets in which they operate. The supplier acknowledges the principle of equal pay in relation to workers of the same professional category and equal performance, particularly between men and women. (ILO Convention no. 100).
- **薪酬和社会福利:** 蒙德拉贡的供应商、承包商和外部合作伙伴将根据职工的技能、责任和职责提供适当的报酬并进行调整，且符合适用的立法及其运营市场的条件。供应商承认同一职业类别工人的同工同酬原则，特别是男女同工同酬的原则。（国际劳工组织公约第100号）。
- **Work shift:** The working hours and breaks must at least comply with the applicable legislation in force, the standards of the business sector, or the ILO conventions, according to whichever of these is the most stringent.
- **轮班:** 工作时间和休息时间必须至少符合现行适用的法律、商业部门的标准或国际劳工组织的公约，以其中最严格的标准为准。
- **Fair treatment:** The practice or support of acts of physical, verbal, sexual or psychological harassment, abuse or threats in the workplace is prohibited. Any disciplinary policies and procedures to be defined shall be duly communicated to all workers, and measures shall be taken to prevent and remedy such acts.
- **公平对待:** 禁止在工作场所实施或鼓励身体、言语、性或心理骚扰、虐待或威胁的行为。任何有待制定的纪律政策和程序都应及时传达给所有工人，并应采取措施防止和纠正此类行为。
- **Discrimination and equal opportunities:** Any discrimination in hiring and professional advancement is prohibited, whether it is based on culture, nationality, sex, religion, political and union beliefs, differences in experience, professional career, physical characteristics, pregnancy, age, health status, or sexual orientation. (ILO Convention no. 111). The suppliers, contractors and external partners of Mondragon Assembly will promote equal opportunities in recruitment, pay, access to training, promotion and professional development.
- **歧视和机会平等:** 禁止在雇用和专业晋升方面的任何歧视，无论是基于文化、国籍、性别、宗教、政治和工会信仰、经验差异、职业生涯、身体特征、怀孕、年龄、健康状况或性取向。（国际劳工组织公约第111号）蒙德拉贡的供应商、承包商和外部合作伙伴将促进在招聘、薪酬、培训、晋升和专业发展方面的机会平等。
- **Local communities and indigenous populations:** the suppliers, contractors and external partners of Mondragon Assembly must respect the rights of the communities, including indigenous ones, in places where they operate, with a commitment to ensure that their activities do not adversely affect the traditional ways of life and work of the people living in their areas of activity.



- **当地社区和当地居民:** 蒙德拉贡的供应商、承包商和外部伙伴必须尊重其经营地的社区（包括原住民社区）的权利，并承诺确保他们的活动不会对生活在其活动领域的人民的传统生活方式和工作方式产生不利影响。
- **Health and safety:** The supplier undertakes to implement effective occupational health and safety policies based on prevention, and in the form of action plans and commitments that involve everyone, according to their level of responsibility, including social organisations. (ILO Convention no. 155). Workers must have a healthy and safe work environment, which meets or exceeds the applicable occupational health and safety standards. Ensure that any potential risk situation that could affect workers, customers, users or the safety of the site is notified, assessed and managed appropriately.
- **健康和安全:** 供应商承诺根据每个人(包括社会组织)的责任程度，以行动计划和承诺的形式，以预防为基础，实施有效的职业健康和安全管理政策。(国际劳工组织公约第155号)。工人必须有一个健康和安全的工作环境，达到或超过适用的职业健康和安全管理标准。确保任何可能影响工人、客户、用户或现场安全的潜在风险都得到适当的通知、评估和管理。
- **Environment:** suppliers, contractors and external partners will maintain a constant commitment to protecting the environment and will comply with the standards and requirements set out in applicable local and international legislation. They will incorporate environmental criteria into their business processes, new projects, activities, products and services, as well as in the selection and evaluation of their suppliers. The prevention of pollution and continuous improvement will be ensured.
- **环境:** 供应商、承包商及外部合作伙伴须持续致力于保护环境，并遵守本地及国际法例所制定的标准及要求。他们将环境标准纳入其业务过程、新项目、活动、产品和服务以及供应商的选择和评估中。确保污染防治和持续改善。

### 3. COMPLIANCE GUIDELINES

#### 合规准则

- **Integrity:** The Mondragon Assembly Group companies, as well as their suppliers, subcontractors and collaborating companies, are committed to conducting their business with integrity and in accordance with the legal requirements, adhering to the applicable laws and international standards of business ethics. We comply with all applicable laws and regulations in the countries in which we operate.
- **诚信:** 蒙德拉贡集团的公司及其供应商、分包商和合作公司致力于诚信经营业务，并遵守现行法律和商业道德的国际标准。我们遵守经营所在国所有现行的法律法规。
- **Corruption and bribery:** In their dealings with third parties, and in particular with public authorities and institutions in the various countries in which they operate, Mondragon Assembly suppliers, contractors and external partners shall act in accordance with national and international provisions for the prevention of corruption and bribery and, in particular, with the principles established by the OECD Convention on Combating bribery of foreign public officials in business transactions. They may not accept, offer or confer, either directly or indirectly, gifts or compensation of any kind that are intended to improperly influence their business, professional or administrative relationships, either with Mondragon Assembly or with other public or private organisations.



- **腐败和贿赂:** 在与第三方打交道时，特别是与其经营国家的公共部门和政府机构打交道时，蒙德拉贡的供应商、承包商和外部合作伙伴应按照国家防止腐败和贿赂的国家和国际准则行事，特别是根据经合组织《打击国际商业交易中贿赂外国公职人员公约》确立的原则行事。他们不得直接或间接接受、提议或授予任何旨在不当地影响其业务、专业或行政关系的礼品或报酬，无论是与蒙德拉贡还是其他公共或私人组织的关系。
- **Conflict of interest:** We avoid conflicts of interest, in particular, when disclosing any financial interest that an employee of Mondragon Assembly may have in a supplier, and when not accepting or soliciting, directly or indirectly, any benefit from a supplier of Mondragon Assembly with a view to awarding business. We do not allow third parties or suppliers to influence or attempt to influence Mondragon Assembly employees or their families by offering them gifts, favours, entertainment, personal benefits or preferential treatment that is beyond a modest and/or reasonable magnitude and that clearly cannot be considered a culturally acceptable display of business manners or mere hospitality.  
No gifts or favours will be accepted that could be construed as being intended to influence the objective decision-making process of our employees, directors or those acting on behalf of Mondragon Assembly.
- **利益冲突:** 我们避免利益冲突，特别在披露蒙德拉贡的员工在供应商中可能拥有的任何财务利益，以及在不直接或间接接受或索取蒙德拉贡的供应商的任何利益以授予业务时。我们不允许第三方或供应商通过向蒙德拉贡的员工或其家属提供超出适度或/或合理规模的，显然不能被视为文化上可以接受的商业礼仪或单纯的款待的礼物、优惠、娱乐、个人福利或优惠待遇来影响或试图影响他们。  
不会接受任何可以解释为意在影响我们员工、董事或代表蒙德拉贡的人的客观决策过程的礼品或恩惠。
- **Money laundering:** Mondragon Assembly suppliers, contractors and external partners must adopt measures to prevent money laundering in any financial transactions. It is important to remain vigilant regarding any payments related to our business that come from unidentified sources or unrecognised bank accounts, or bank accounts unrelated to the paying party, or that are not consistent with the amounts we expect to receive in payment.
- **洗钱:** 蒙德拉贡的供应商、承包商和外部合作伙伴必须采取措施防止任何金融交易中的洗钱活动。对于不明来源或未确认的银行账户，或与付款方无关的银行账户，或与我们预期收到的付款金额不一致的付款，必须保持警惕。
- **Privacy and information:** Suppliers, contractors and external partners are required to preserve the integrity and confidentiality of the information they receive as a result of their business relationships with Mondragon Assembly. The obligation of confidentiality will remain once their relationship with Mondragon Assembly has ended.  
They must comply with the current legislation on data protection in each country, respecting the right to privacy and protecting personal data entrusted to them by third parties.
- **隐私和信息:** 供应商、承包商和外部合作伙伴必须保持他们因与蒙德拉贡的业务关系而收到的信息的完整性和保密性。一旦他们与蒙德拉贡的关系结束，保密义务将保持不变。  
它们必须遵守每个国家关于数据保护的现行立法，尊重隐私权，并保护第三方委托给他们的个人数据。



- **Intellectual property:** Mondragon Assembly suppliers, contractors and partners shall protect Mondragon Assembly's intellectual property, which includes, among others, rights to patents, trademarks, domain names, reproduction rights, design rights, database extraction rights and specialised technical knowledge rights.  
Suppliers, contractors and external partners will follow the rules and procedures in this area in their relations with third parties.
- **知识产权:** 蒙德拉贡的供应商、承包商和合作伙伴应保护蒙德拉贡的知识产权，其中包括但不限于专利权、商标权、域名权、复制权、设计权、数据库提取权和技术诀窍。供应商、承包商和外部合作伙伴在与第三方的关系中将遵循这方面的规则和程序。

## 4. BUSINESS ETHICS GUIDELINES

### 商业道德准则

- **Fair competition:** Fair business, advertising and competition standards shall be maintained, and responsible taxation shall be exercised, with the presentation and payment of tax obligations on a timely basis and avoidance of double accounting.
- **公平竞争:** 维护公平经营、广告和竞争标准，负责任地纳税，及时申报纳税义务，避免双重核算。
- **Promotions and advertising:** Mondragon Assembly suppliers, contractors and external partners must take the utmost care to preserve the image and reputation of MA in their professional activities. They will also oversee the respect for and correct use of the image and reputation of Mondragon Assembly on the part of their employees and subcontracted companies.  
When marketing products and services, they must use promotions and advertising that respect human dignity, health and safety, that are not misleading and that do not encourage behaviour that is illegal, dangerous or contrary to the principles of sustainability and social responsibility.
- **促销和广告:** 蒙德拉贡的供应商、承包商和外部合作伙伴必须尽最大努力维护蒙德拉贡在其专业活动中的形象和声誉。他们还将监督其员工和分包公司尊重和正确使用蒙德拉贡的形象和声誉。  
在销售产品和服务时，他们必须使用尊重人的尊严、健康和安全的促销和广告，这些宣传和广告不具有误导性，不鼓励非法、危险或违反可持续性和社会责任原则的行为。
- **Quality and safe goods and services:** the products and services delivered by suppliers, contractors and external partners must comply with the quality and safety standards and parameters required by the applicable laws, paying particular attention to compliance with prices and delivery times.
- **质量和安全的商品和服务:** 供应商、承包商和外部合作伙伴提供的产品和服务必须符合现行法律要求的质量和标准参数，特别注意遵守价格和交货时间。
- **Contracts:** Mondragon Assembly, as well as its suppliers, contractors and partners, will draw up and implement contracts in accordance with the principles of transparency, truthfulness, trust and good faith. They must also avoid abusive actions arising from any possible position of dominance. Clear, complete and truthful information must be provided regarding the characteristics of goods and services, prices, quotations, guarantees, insurance and taxes.
- **合同:** 蒙德拉贡及其供应商、承包商和合作伙伴将按照透明、真实、信任和诚信的原则制定和执行合同。他们还必须避免因任何可能的支配地位而引起的权利滥用行为。



必须提供明确、完整和真实的信息，说明商品和服务的特点、价格、报价、质保、保险和税收。

## 5. ACCEPTANCE AND COMPLIANCE WITH THE CODE

### 接受和遵守准则

This Code of Conduct is obligatory for all suppliers, contractors and external partners of Mondragon Assembly.

Suppliers, contractors and external partners must implement appropriate mechanisms for disseminating this Code to their employees and especially to those who perform work for Mondragon Assembly.

They will also be responsible for ensuring that their own suppliers, contractors and external partners are subject to behaviour standards equivalent to those of this Code of Conduct.

Mondragon Assembly expects a high level of commitment from all its suppliers, contractors and external partners when it comes to complying with the Supplier Code of Conduct.

Mondragon Assembly will terminate business relations with those suppliers, contractors or external partners who violate the guidelines of conduct defined in this Code, especially those referring to human rights and corrupt practices.

本行为准则对蒙德拉贡的所有供应商、承包商和外部合作伙伴均具有强制性。

供应商、承包商和外部合作伙伴必须实施适当的机制，向员工，特别是为蒙德拉贡工作的员工传播本准则。

他们还将负责确保自己的供应商、承包商和外部合作伙伴遵守相当于本行为准则的行为标准。

蒙德拉贡期望其所有供应商、承包商和外部合作伙伴在遵守《供应商行为准则》方面做出高度承诺。

蒙德拉贡将终止与那些违反本行为准则的供应商、承包商或外部伙伴，特别是那些涉及人权和腐败行为的供应商、承包商或外部伙伴的商业关系

## 6. VALIDITY AND APPROVAL

### 有效性和批准

This Code of Conduct is approved by the Conduct and Compliance Committee.

It will be reviewed periodically and at the suggestion of the Purchasing, Compliance, Environment and Social Responsibility departments, and these reviews will take into account any suggestions and proposals made by suppliers and contractors.

本行为守则由行为和合规委员会批准。

将定期根据采购、合规、环境和社会责任部门的建议进行审查，这些审查将考虑到供应商和承包商提出的任何意见和建议。